



Valdi Licul  
[vlicul@wigdorlaw.com](mailto:vlicul@wigdorlaw.com)

April 22, 2025

**VIA ECF AND EMAIL**

The Honorable Richard J. Sullivan  
 U.S. Court of Appeals for the Second Circuit  
 500 Pearl Street  
 New York, New York 10007

Re: Oakley v. MSG Networks, et al.; Civil Case No. 17-cv-06903 (RJS)

Dear Judge Sullivan,

We represent Plaintiff Charles Oakley (“Plaintiff” or “Oakley”) in this matter and write regarding our opposition to the MSG Defendants’ Daubert motion (ECF 356) to exclude the reports and testimony of Larry B. Perkins, to be filed Thursday. In accordance with the Confidentiality Agreement in this matter, Dkt. 176 § 9, Plaintiff conferred with counsel for the MSG regarding the exhibits Plaintiff plans to file in connection with his opposition. MSG requested that Plaintiff seal certain confidential materials and personal identifying information including the following:

- MSG\_OAKLEY\_0000667-676
- MSG\_OAKLEY\_0000713-716

Accordingly, Plaintiff plans to file these exhibits under seal, with related redactions to his brief. Plaintiff respectfully requests permission to file unredacted versions of these documents preliminarily under seal in anticipation of Defendants filing motions to permanently seal them. Dkt. 176 (“In all cases, the proponent of confidentiality, i.e. the designating party, regardless of whether that is the party filing the document, shall bear the burden of moving the Court for an order of sealing.”). Plaintiff does not intend to move to permanently seal these documents or maintain these redactions.

Respectfully submitted,

Valdi Licul

cc: All Counsel of Record (via ECF)

Plaintiff's motion to preliminarily seal the unredacted copies of his brief and certain exhibits in connection with his forthcoming opposition to Defendants' motion to preclude expert witness Larry Perkins is GRANTED. If Defendants wish to maintain these documents under seal, they shall file a motion explaining why continued sealing is justified in light of the presumption in favor of open records. See *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006). The Clerk of Court is respectfully directed to terminate the motion pending at Doc. No. 370.

SO ORDERED:

Dated: 4/23/2025

RICHARD J. SULLIVAN

U.S.C.J., Sitting by Designation